## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

In re:	)	20-45189-399
Frank Taylor Kremer	)	
Tammy Antoinette Kremer	)	
Debtors	)	Chapter 13
	)	
Diana S. Daugherty,	)	Hearing Date: 04/06/2022
Chapter 13 Trustee/	)	Hearing Time: 10:00 a.m.
Respondent.	)	Hearing Location: 5 North

## NOTICE OF HEARING AND MOTION TO RETAIN FUNDS

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE BY THE HEARING DATE. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. THE DATE IS SET OUT ABOVE. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

## REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.

COME NOW Debtors, by and through Debtors' attorney and state as follows:

- 1. On March 23, 2022, Debtors' vehicle, 2010 Honda Odyssey Wagon, was totaled in an accident.
- 2. Debtors filed a claim with the insurance company, State Farms Mutual Automobile Insurance Company having the claim no #25-31W8-98M.
- 3. Insurance company will be paying in total a sum of \$5,784.50 in insurance proceeds to the Debtors to settle the claim after taking out the deductibles and title transfer fees.
- 4. Debtors are currently without any vehicle and needs a transportation to get back and

forth to work.

- 5. Debtors' other vehicle 2014 Volkswagen Jetta SportWagen has been in an accident last year on November 11, 2021 and to date the vehicle is still under repairs. Debtors' Insurance Company will be paying out for the damages incurred as a result of the wreck, but debtors still need to pay \$500 as a participation fee.
- 6. Therefore, Debtor wishes to retain their share from the insurance proceeds to purchase a used car.

WHEREFORE, Debtor prays for an Order of this court allowing Debtor to retain insurance proceeds in the amount of \$5,784.50.

Respectfully Submitted,
A&L LICKER LAW FIRM, LLC

/s/Tobias Licker Tobias Licker, E.D. #56778MO 1861 Sherman Drive St. Charles, MO 63303 Tel:(636)916-5400 Fax:(636)916-5402 Tobias@lickerlawfirm.com

## **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the **Forgoing Document** was filed electronically with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List on April 1, 2022.

I certify that a true and correct copy of the **Forgoing Document** was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to those parties listed on the Court's Manual Notice List and listed below on April 1, 2022.

/s/ Saloni Mehta

Diana S. Daugherty Via CM/ECF Chapter 13 Trustee P.O. Box 430908 St. Louis, MO 63143

Office of the US Trustee 111 S Tenth St, Ste 6.353 St. Louis, MO 63102-1127 Via CM/ECF

ACE Cash Express 300 E. John Carpenter Fwy Ste 900 Irving, TX 75062 Angel Investments, Inc 1671 S Old Hwy 141 Suite D Fenton, MO 63026 Bank Of America Po Box 982238 El Paso, TX 79998

Bank of America 707 North Second St Suite 306 Saint Louis, MO 63102

Blue Frog Loans PO Box 725, Fenton, MO 63026 Capital One Bank Usa N Po Box 30281 Salt Lake City, UT 84130

CardioNet, LLC PO Box 508 Malvern, PA 19355 Cash Central 84 E 2400 N Logan, UT 84341

Cash Link USA, LLC 3000 Ne Brooktree Ln, Ste 100 Kansas City, MO 64119

CashNet USA PO Box 643990 Cincinnati, OH 46264-3990

Cavalry Portfolio Service 500 Summit Lake Dr Valhalla, NY 10595 Cavalry SPV LLC 707 N 2nd St Ste 306 Saint Louis, MO 63102 Check 'n Go Check City Check Into Cash 1415 N Grand Blvd PO Box 970028 201 Keith Street Orem, UT 84097 Saint Louis, MO 63106 Suite 80 Cleveland, TN 37311 Citi Bank Clear Loan Solutions Community Quick Cash Po Box 6497 600 F Street 1671 S Old Hwy 141 Ste D Sioux Falls, SD 57117-6497 Fenton, MO 63026 Suite 3 #721 Arcata, CA 95521 Complete Credit Solution Credit One Bank Na Daniel Scott Rabin 2921 Brown Trail Po Box 98872 PO Box 480707 Bedford, TX 76021 Las Vegas, NV 89193 Kansas City, MO 64148 David H Bailey, Jr. David J Page David Joseph Page 4610 Mexico Rd Blitt And Gaines PC 707 North 2nd Street 707 N Second Street Saint Peters, MO 63376 Suite 306 Suite 306 Saint Louis, MO 63102 Saint Louis, MO 63102 Dfs/cash Central Of Mi Discover Fin Svcs Llc Easy Cash ASAP 9240 Glenwood Street, Suite A 84 E. 2400 N. Pob 15316 North Logan, UT 84341 Wilmington, DE 19850 Overland Park, KS 66212 **Evergreen Services** Fed Loan Serv Fig Loans Texas Llc PO Box 834 335 Madison Ave Floor 16 Pob 60610 New York, NY 10016 Lac Du Flambeau, WI 54538 Harrisburg, PA 17106 First Bank Mortgage Green Trust Cash **Huntington Debt Holding LLC** #1 First Missouri Center 210 John Glenn Suite 10 PO Box 340 Saint Louis, MO 63141 Hays, MT 59527 c/o Loan me Amherst, NY 14228 **IRS** John G Heimos Jpmcb Card PO Box 7346 10805 Sunset Office Drive Po Box 15369 Philadelphia, PA 19101-7346 Wilmington, DE 19850 Suite 300 Saint Louis, MO 63120-7000 Kohls/capone Julie Ann Anderson King of Kash

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LendNation 8208 Melrose Dr LoanMe Inc. PO Box 5645 Orange, CA 92863

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Luke, Johnson & Lewis, LLC P.O Box 520246 Salt Lake City, UT 84152

Metropolitan St Louis Sewer District 10805 Sunset Office Dr Suite 300 Saint Louis, MO 63127

Midland Finance c/o EZ Money 400 Central St Kansas City, MO 64111 Missouri Department of Revenue PO Box 475 301 W. High Street Jefferson City, MO 65105-0475

MM Finance 4006 Central Street Kansas City, MO 64111

Money Stash MO LLC 8807 W. Sam Houston Parkway North Suite 200 Houston, TX 77040

Moneylion 110 Hammond Drive Suite 110 Atlanta, GA 30328

MSD c/o John Heimos 10805 Sunset Office Dr Ste 300 Saint Louis, MO 63127

**MSD** PO Box 437 Saint Louis, MO 63166 National Credit adjusters PO Box 550 Hutchinson, KS 67504

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National Debt Holdings 401 East Las Olas Blvd Suite 1400, Fort Lauderdale, FL 33301 NIIWIN, LLC d/b/a Lendgreen PO Box 221, Lac Du Flambeau, WI 54538 Nine Torches PO Box 783 Lac Du Flambeau, WI 54538

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